Baldy Mountain Vegetation Management Project

Response to Comments

August 2019

Addressed in this document are the comments received during the public 30-day comment period for the *Baldy Mountain Vegetation Management Project* Pre-Decisional Draft EA. Previous input received during the scoping period was addressed during the development of the Draft EA and is summarized in the Draft EA and Scoping Summary and detailed in the project record.

Comments during the 30-day comment period were received from four external sources: two from individuals, one from a timber industry group, and one from the state wildlife agency. One of the individuals was opposed to use of glyphosate herbicide; the other individual was concerned with harvest of green trees; the other commenters were generally supportive of the project, with suggestions. A listing of all the comments follows in the table. Full text of the comments can be found in the project record. All project record documents are available upon request.

Response to Comment Letters.

Commenter/ Comment #	Topic, Issue, or Paraphrase	Forest Service Response
Molly Pits, Intermountain Forest Association		
1-1	Very supportive … we concur with the Needs for the Proposal and the Proposed Action	Thank you for your support.
1-2	Keep current operators and businesses in mind while planning this project.	The viability of harvest volume quantities and contract terms in this proposal was informed by feedback from purchasers of two recent timber sales in the area.
1-2	7 ccf/acre may not be enough volume	7 ccf was the lowest end of the range; it is anticipated that the average will be higher. Contracts will be composed of a combination of higher and lower volume per acre areas.
1-3	Prioritize acres for salvage and sanitation harvest first, with green and improvement harvest done later	To minimize cumulative effects of harvests on wildlife and recreation activities, green and improvement harvest within and adjacent to salvage harvest stands will be completed in the same contract.
1-4	Change slope restriction to 40%. The Forest Plan does not limit to 35%, not does the EA justify the restriction. Other mitigation measures could be utilized to minimize disturbance.	Overall, the Baldy landscape contains relatively gentle terrain. The area of slopes exceeding 35% is estimated at less than 15 acres across the entire project area and is concentrated in relatively inaccessible areas near canyons.

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1-5	Change slash restriction to 3 feet for salvage units.	Higher slash heights will result in greater surface shading, a condition associated with higher tree seed germination and regeneration establishment success, particularly on south aspects which are common within the project area. This change in slash height should is not expected to negatively impact fuel hazards in the area. The Design Criteria has been changed to reflect this.
Ty Smith, Colorado Parks and Wildlife		
2-1	Generally support the project and think it will provide long-term benefits.	Thank you for your support.
2-2	Further limitations on work areas during elk calving season would be beneficial. Suggest limiting work to one work area on the edges of the production area during this season.	The Normal Operating Season for this forest type typically ranges from July 1 to October 30, with the primary constraint being wet soils and snowpack present in the area early in the season. Restricting operations to one active work site from May 15th to June 30th should have a negligible impact on harvest operations and overall contract viability during years of average snowfall while benefiting elk populations The Design Criteria has been changed to allow one work location during calving season.
Dick Artley		
3-1	Disagrees with the use of glyphosate herbicide.	The authorization of herbicide use on the San Juan and Rio Grande National Forests is beyond the scope of this decision, because it is authorized under a previous decision. Even though glyphosate is authorized for use, current weed treatment practices on the SJNF are not to use glyphosate (other than occasional use at developed administrative sites).
William Baker		
4-1	Re-focus the Need to retain surviving trees and enhancing recovery after the beetle outbreak.	Proposed harvests are expected to reduce a small proportion of standing dead and green trees across the broader landscape. The vast majority of spruce-fir forests within adjacent watersheds across the south side of Continental Divide on the San Juan National Forest will not feature any active management due to wilderness, roadless and special management area designations or because of terrain and operability constraints. Since some areas within the actively managed landscape will also be deferred from harvest due to terrain, infrastructure, stocking levels and hydrological protections, the overall harvest area will be an even smaller proportion of the surrounding spruce-fir forest landscape. All trees less than approximately 10” in diameter will be protected and retained following harvest, except in limited instances where removal is necessary to facilitate harvest operations (e.g. landings, roads, skid trails) See response to comment 4-2 below.

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4-2	Disclose and analyze the adverse effects of salvage logging and review mitigation options. Limit salvage to 50% or less of dead trees.	The effects of the Proposed Action, including salvage logging are disclosed in the EA and specialist reports. The proposed harvest area has been designated for active management and a timber production focus in the San Juan NF LRMP. Reducing per-acre harvest output and footprint will reduce the economic viability of contracts resulting from this proposal. The vast majority of trees at the landscape scale will not be harvested (see comment 4-1 above). Additionally, the minimum number of snags required by the Forest Plan (1 snag/acre of at least 12 inches dbh, or 2-3 snags/acre of at least 9 inches dbh if larger size classes are not available) is expected to be exceeded on a per-acre basis following harvest, due to the abundance of non-commercially valuable standing dead trees and continue beetle mortality.
4-3	No green tree harvesting. There is no scientific basis for logging green trees while a beetle outbreak is underway.	Discussion of salvage-only harvesting was added to the Public Involvement section of the EA as an alternative considered, but dismissed.
4-4	Paired plot monitoring could help us learn how forests in the local area react to salvage logging and to climate change.	Standard procedure is the follow-up monitoring of regeneration stocking will take place 1, 3 and 5 years following harvest to determine whether harvested areas meet minimum tree stocking standards in the SJNF LRMP. Additionally, compliance with watershed Best Management Practices will be monitored following completion of harvests. The San Juan NF and other National Forests in the San Juan Mountains are actively involved in several monitoring efforts to understand the response of harvested mixed-conifer and spruce-fir forests subject to spruce bark beetles. These efforts involve local, academic and research partners and are currently taking place in near Pagosa Springs and the GMUG National Forest. Local practitioners will learn from these efforts to inform future management. The need to duplicate these efforts for every project, including this one, is unnecessary. While a formal monitoring effort coordinated with external partners is not part of this proposal, a Design Criteria was added, requiring photo points within harvested areas to be installed as part of sale preparation activities. These photo points can be re-measured following harvest and compared to photo points in the adjacent forest in the future if conditions warrant.
4-5	Would like to see these comments addressed as alternatives, and the over-all alternative approach as a whole analyzed.	Alts dismissed are considered as part of the Range of Alternatives.

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4-6	The Final EA should cite Lindenmayer et. al. 2008. Salvage Logging and Its Ecological Consequences.	This book was reviewed and considered with reference to the proposed action and environmental analysis. Much of this reference refers to similar salvage harvests, ranging from post-fire, post-weather event (i.e. hurricane, wind-events, etc…) and post-insect outbreak harvests in other forest types. Despite the lack of direct applicability to subalpine spruce-fir forests, the book broadly addresses ecological considerations for managing forests after disturbances. It also recognizes the need for active forest management as an "essential element of forest stewardship." While this specific reference was not incorporated in the design of the proposed action and not cited in the EA, several management recommendations made in the book are consistent with the design of the project proposal, including: • Maintenance of structural complexity in forest stands through deferral of harvest from approximately 1/3 of the analysis area (p.140). • Retention of unharvested areas along streamcourses and hydrologically sensitive areas (p.141). • Retention of large untreated (unharvested) forest tracts (i.e. control areas) in the adjacent landscape (p.132). • Retention of biological legacies (snags, advanced tree regeneration and healthy, windfirm green trees) within harvest areas (p.143-146). • Rehabilitation and closure of any temporary roads following use during harvests (p.137).
Curt Larsen, San Juan Trail Riders		
5-1	Would like to see old single track restored for use, and would like to partner with the Forest Service for that purpose.	A Travel Management analysis, public comment process, and decision for this landscape was conducted in 2010 and is beyond the scope of this decision.